Child Nutrition
Maine Department of Education

Preparing for Your Upcoming Administrative Review

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Maine School Nutrition Association Conference
August 10, 2016

Objectives

- Provide an understanding of the Administrative Review process

- Identify common errors discovered during the Administrative Review process

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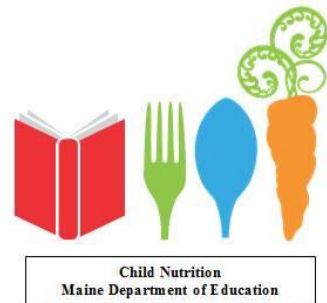
The Big Picture

Off-Site Assessment Tool & Documentation

On-site Review

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Validate SFA Responses

Review Frequency & Schedule

Frequency

– SFA must be reviewed every 3 years

Review Period (Review Month)

– Most recent month claim submitted

Week of Review

– Menu review during the Review Period

Day of Review

– On-site Review

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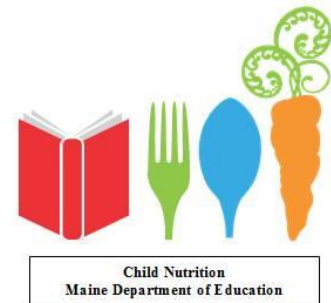Maine Department of Education

Review Areas

Meal Access & Reimbursement	Meal Pattern & Nutritional Quality	Resource Management	General Program Compliance	Other Federal Program Reviews
• Certification & Benefit Issuance • Verification • Meal Counting & Claiming	• Meal Components & Quantities • Offer versus Serve • Dietary Specs & Nutrient Analysis	• Risk Assessment • Nonprofit School Food Service Account • Paid Lunch Equity • Revenue from Non-program Foods • Indirect Costs • USDA Foods	• Civil Rights • SFA On-site Monitoring • Local Wellness Policy • Competitive Foods • Water • Food Safety • SBP & SFSP Outreach	• Afterschool Snacks • Seamless Summer Option • Fresh Fruit & Vegetable Program • Special Milk Program

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Pre-Visit Procedures

- Superintendent notified

- Off-site Assessment Tools & Pre-visit Information

- State Agency reviews documentation

- Select sites for on-site review

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Sample Schedule For Multi-School Review

Day One

- Arrive at Director's office and review applications, verification & paperwork
- Prior to lunch service, arrive at the kitchen to observe documents, production, and meal service
- Verify accountability
- Continue review of paperwork

Day Two

- Arrive at second school and observe breakfast
- Review financials and finish paperwork
- Review FFVP if applicable
- Observe lunch at second school
- Exit interview

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PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

Verification

Meal Counting & Claiming

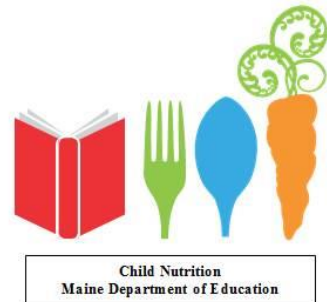*Verifying that meals claimed for reimbursement were served only to eligible students.*

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PS1: Meal Access & Reimbursement

Certification & Benefit Issuance

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PS1: Meal Access & Reimbursement

Off-site

- SFA answers questions in Off-site Assessment
- SFA sends electronic benefit issuance file
- SFA send additional documentation

On-site

- Review student eligibility documents
- Review denied applications

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Benefit Issuance Documentation

Electronic list (Excel) of **all** free and reduced priced students

- All students in the <u>district</u>
- Do not include withdrawn or paid students
- List to be pulled from the Point of Service (POS)
- List should be pulled during the Review Period/Review Month

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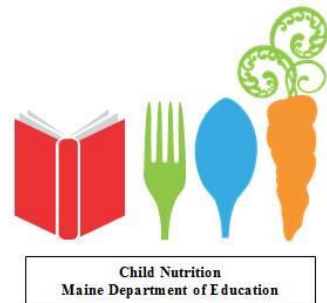
Off-site Benefit Issuance Documentation

Sample Benefit Issuance List

Student Name	Benefit Status	Method of Certification	School Name	Approval Date
Walter Beesley	F	DC	Smith ES	9/2/2015
David Hartley	R	Income Application	Harrison MS	8/30/2015
Sarah Platt	F	SNAP Application	Jones HS	9/10/2015
Gail Lombardi	F	Foster	Jones HS	9/2/2015

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On-site Benefit Issuance Documentation

- Approved meal benefit applications

- Denied meal benefit applications

- Direct certification lists

- Homeless list
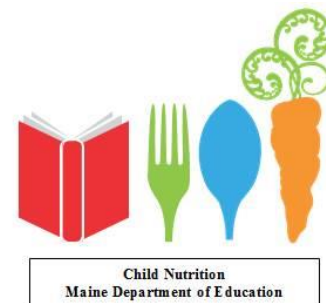
Common Review Findings

✓ Incomplete Applications

✓ Miscategorized Applications

✓ Incorrect SNAP/TANF number

✓ Missing documentation (Keep <u>ALL</u> DC lists)

✓ Not converting to annual income when different frequencies of income are reported
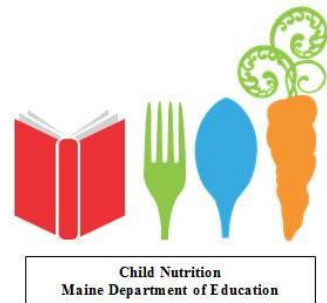
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PS1: Meal Access & Reimbursement

Verification

Verification

- Was it completed on time?
- Used correct method (error prone)
- Compare verification report to documentation
- Follow-ups were made (use tracking form)
- Notification letter met standards
- Eligibility status changes

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Verification

HOUSEHOLD FILE CONTROL FORM

Internal Use Only

Head of Household Name: _____

Date Selected: _____ Notification Sent: _____

Response Due: _____ Second Notice Sent: _____

Response Due: _____ Missing Information: _____

_____

DOCUMENT ALL TELEPHONE CONTACTS ON REVERSE SIDE OF THIS PAGE.

Date Reduction/Termination Notice Sent: _____

Food Stamp/TANF Household   Income Household: $_____ Monthly

Confirmed By -   Confirmed by -

[ ] Predetermined Eligibility List   [ ] Wage stubs

[ ] Food Stamp/TANF Office   [ ] Written documents (Explain below)

[ ] ATP Card   [ ] Collateral Contacts (Explain below)

[ ] Other:_____   [ ] Agency Records

[ ] Eligibility not confirmed   [ ] Other:_____

Explanation:_____

_____

Verification Result:

[ ] No Change [ ] Reduced to Free [ ] Free to Reduced [ ] Ineligible

Reason For Change: [ ] High Income   [ ] Refused to Cooperate
                    [ ] Food Stamp/TANF Eligibility Not Confirmed
                    [ ] Other - include self denial

Signature of Verifying Official: _____

Date:

Verification Notification and Tracking Forms
www.maine.gov/doe/nutrition/forms/index.html

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Common Verification Errors

✓ Use the correct method

- Error prone
- Mark the Error prone applications when approving

✓ Double check your math

- A family application who is on direct cert is NOT included in the number of applications
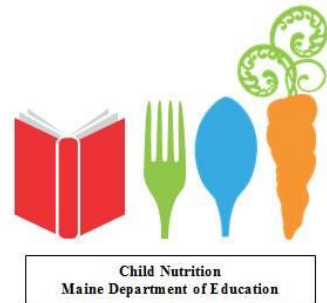
✓ Follow protocol/timeline

✓ Eligibility changes

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PS1: Meal Access & Reimbursement

Meal Counting & Claiming
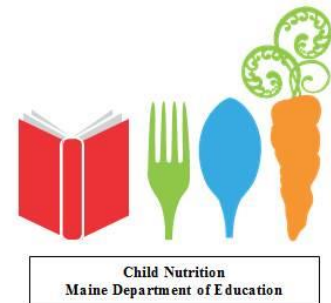
On-Site Documents Needed

- Meal counts by day for the Review Period
    - Breakfast & Lunch
    - All schools in the District
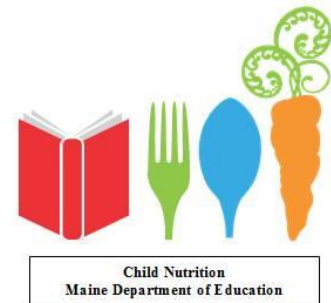- Edit Checks

Meal Counting and Claiming

- Provide an Accurate Count at POS

- Eligibility Category
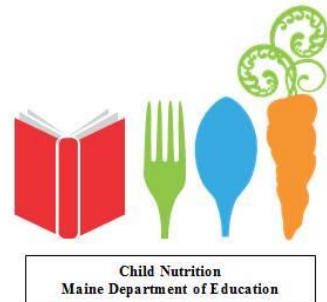
- Without Overt Identification
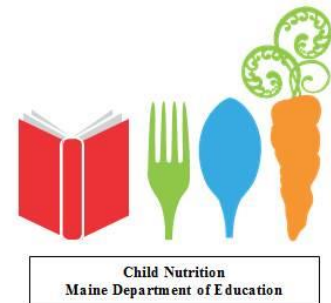
Meal Counting and Claiming

- Type of System Used

- Back up system

- Training

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Breakfast in the Classroom (BIC)

- Train teachers

- Monitor the program to ensure requirements are being met

- Must offer two types of milk

PS2: Meal Pattern & Nutritional Quality

Meal Components & Quantities

Offer vs. Serve

Dietary Specifications & Nutrient Analysis

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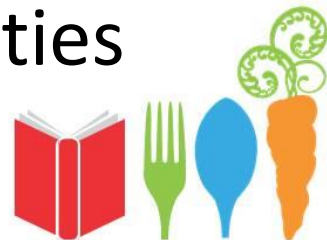Maine Department of Education

PS2: Meal Pattern & Nutritional Quality

SFAs agree to:

- Offer students the required meal components in the required quantities

- Allow students to select required meal components on <u>all</u> reimbursable lines

- Record/claim <u>only</u> those meals that contain required components in required quantities

PS2: Meal Pattern & Nutritional Quality

Off-site

- Menu
- Production Records
- Component Crediting Documentation
- Recipes, labels, etc.
- Meal Compliance Tool
- Dietary Specifications Tool

On-site

- Observe breakfast & lunch preparation
- Observe breakfast & lunch service
- Validate the off-site review

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Off-Site: Meal Components & Quantities

## Menu Documents: Breakfast & Lunch

- Menu
- Menu Production Records
- Standardized Recipes – food component contribution, ingredients, serving size, yield
- Crediting Information
  - Nutrition Labels (ingredients and nutrition facts)
  - Child Nutrition (CN) Labels
  - Manufacturer's Product Formulation Statements

Review before submitting –
can you determine how everything credits?

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Offer vs. Serve

- Menu must be posted with instructions on how to select a reimbursable meal – include requirement to select ½ cup f/v

- Staff must be able to recognize a meal

- Two full components and ½ cup fruit/vegetable for all age/grade groups

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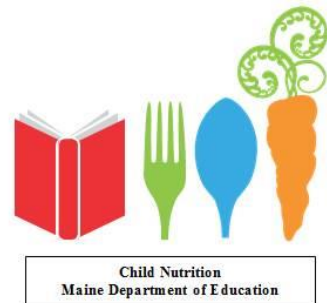
Meal Components & Quantities

Common Findings

- ✓ Insufficient quantities of a component offered
- ✓ Calculation errors when determining meal component contributions
- ✓ OvS not implemented correctly
- ✓ Missing meal components
- ✓ Incomplete production records
- ✓ Field Trips

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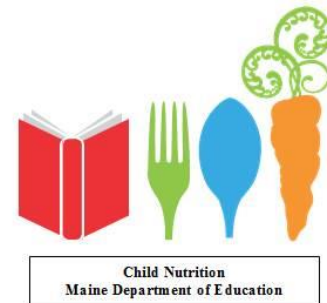
Menu Errors

Missing meal components should not happen

- ✓ Double check menu as planned against the requirements
  - ✓ Daily/weekly minimums
- ✓ Know how to credit components
- ✓ Staff must accurately identify a reimbursable meal at the POS
- ✓ Plan a 2/2 every day!

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Resource Management

Maintenance of the non-profit school food service account
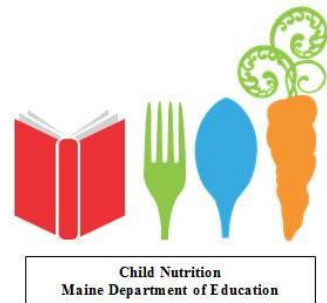
Paid Lunch Equity

Revenue from non-program foods

Indirect Costs

*Procurement new SY 2016-17

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Common Findings

- A la carte should make a profit

- Not reporting costs accurately

- Not Following charging policy

- Cashbook balance does not match the accounting software in the district
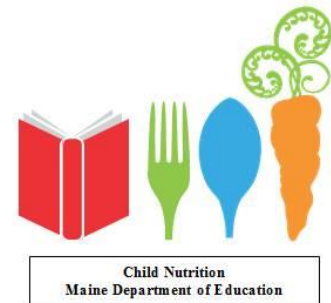
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Adult Pricing

- Must be greater than per meal cost

- Only program adults may receive free meals – not the principal, not the security guard, not the lunch monitor…

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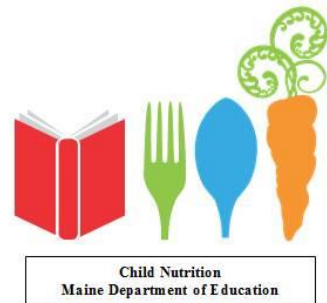
General Program Compliance

1. Civil Rights

2. Food Safety

3. Local Wellness Policy

4. Competitive Foods

5. Water

6. SFA On-site monitoring

7. Reporting and Recordkeeping

8. SBP/SFSP Outreach

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Civil Rights

First item we look for and so should you…

- Posted where your customers can see it

- Translations available on FNS website

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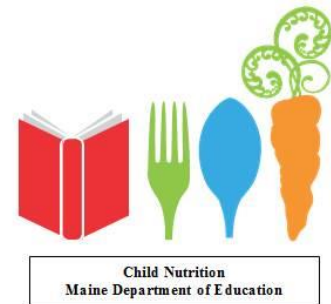**Maine Department of Education**

Civil Rights

- "And Justice for All" poster

- Non-discrimination statement

- Procedures for receiving and processing civil rights complaints within FNS programs

- Documentation for <u>annual</u> civil rights training for staff

- Accommodating students with special dietary needs
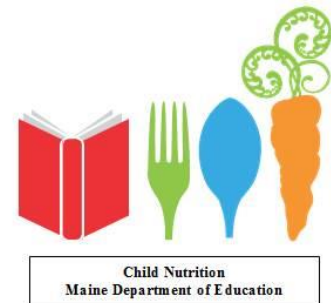
# General Program Compliance

Food Safety

On-Site Documentation

- Food Safety Plan
  - Should be <u>customized</u> for each site
  - Customizable sample from ICN (NFSMI)

- Recordkeeping: Temperature logs, calibration logs

- Certified Food Protection Manager (ServSafe)

- Ghost trays - <u>are</u> required by DOE

- Hair/beard restraints - WEAR THEM

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On-Site Documentation

- Health Inspections

  - Must post recent health inspection in visible location (post a copy, not the original)

  - Keep on file old health inspections

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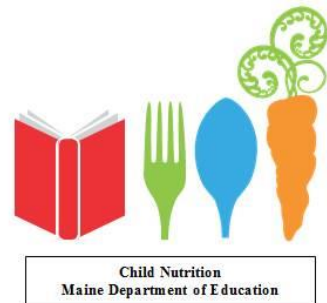
On-Site Observations

Kitchen & Storage areas

- Proper personal hygiene

- Cross contamination prevention

- Temperature monitoring

- Cleaning/sanitizing procedures

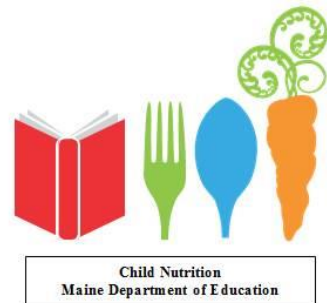- Food stored 6 inches off the floor

- Proper chemical storage

Local Wellness Policy

- Copy of LWP for review

- Has it been updated?

- Does it contain all of the required components?

*Final rule for LWP released July 29, 2016

Competitive Foods/Smart Snacks

- All foods & beverages sold to students during the school day

- Calories posted at point of decision

- Documentation that products are compliant

- Cafeteria/Vending Machines/School Stores

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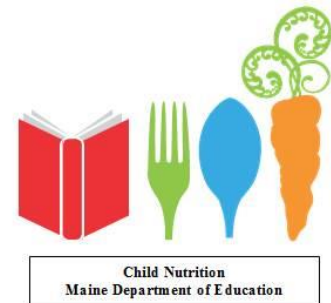
Water

- Free, potable water must be available to students
  - Breakfast
  - Lunch
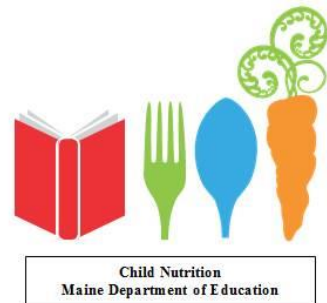
SFA On-Site Monitoring

- For districts with 2 or more schools
- Lunch counting and claiming system must be monitored at <u>each</u> site prior to Feb 1st
- Implement any needed corrective action
- Sample form available on our website

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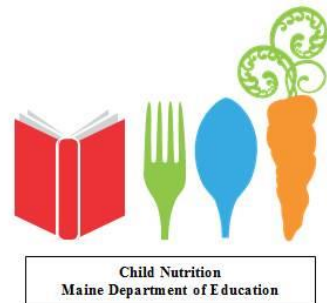**Maine Department of Education**
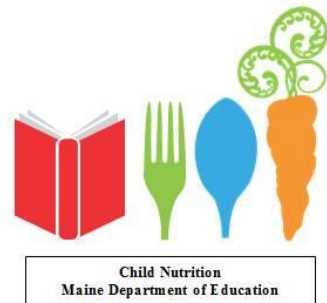
Reporting and Record Keeping

Records must be kept for 7 years!

(financial records, claims, production records...)
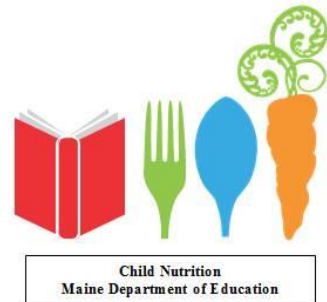
Other Program Reviews

- School Breakfast Program

- Fresh Fruit & Vegetable Program

- Afterschool Snack Program

- Special Milk Program

- Seamless Summer

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School Breakfast Program

- At the beginning of each school year, notification to households that this program is available.

- Review of offsite paperwork

- Onsite observation

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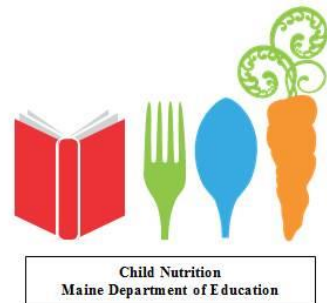
Fresh Fruit and Vegetable Program

- Document - keep invoices
- Review the guidelines
  - FRESH not dried, not frozen, not popcorn…
  - Served during the school day, outside of meal times
  - Not provided to adults except for classroom teachers modeling behaviors
- Training
- Advertise/publicize
- Budgeting/claiming errors—video and tool available to help
- Food safety & sanitation in the classroom

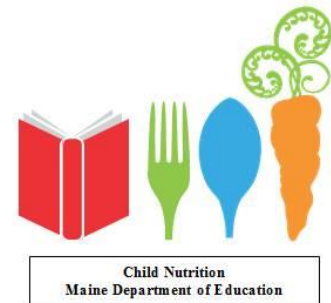**Child Nutrition**
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After School Snack Program

- Eligibility (if school is < 50% free/reduced)

- Accountability/Meal Counting and Claiming

- Menu & Meal Pattern Documentation
  - 2 components = 1 snack
  - Fruit/Veg is ¾ cup serving

- Training Documentation for staff administering/counting and claiming

- Self-Review twice a year
  - First 4 weeks
  - Prior to end of school year
  - Document

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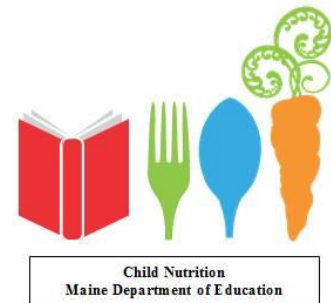Maine Department of Education

Salad Bar After POS

- Requires a waiver from DOE if you are using these items to meet the meal pattern

- A new waiver is required EVERY year

- Student must have a reimbursable meal BEFORE POS

- Request must be detailed and emailed to Walter Beesley

Post Review Activities

- Exit Conference with Superintendent
  - Review observations and findings
  - Corrective Action Plan
  - Potential Fiscal Action

- Administrative Review Report within 30-60 days

- Assess potential fiscal action (if needed)

- Corrective Action
  - To be submitted by deadline
  - Signed by Superintendent
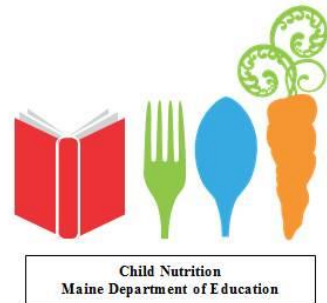 - Attach documentation if applicable

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Resources

Admin Review Checklist

Upcoming Review Training:

September 15, 2016

DOE Staff

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Questions?

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